

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PAULA PAGONAKIS,)
v. Plaintiff,)
EXPRESS, LLC, a/k/a) Case No.: 06-027 (SLR)
LIMITED BRANDS, INC.,)
Defendant.)

**MOTION OF DEFENDANT EXPRESS, LLC
FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendant Express, LLC (“Express”), by and through its undersigned attorneys, hereby moves this Court for summary judgment in its favor on Counts I and II of the Complaint filed by Plaintiff Paula Pagonakis because no genuine issues of material facts exist for trial and Express is entitled to judgment as a matter of law on these claims. A Memorandum of Law in Support and the Affidavit of Counsel is attached hereto in support of this Motion.

Respectfully Submitted,

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